

4. Plaintiff's agreement to this motion does not constitute waiver of any arguments they may have related to contesting jurisdiction.

5. Defendants do not seek this extension of time to create delay. The parties are engaged in discussions to resolve the underlying dispute that resulted in this litigation, and Defendants believe this extension will allow the parties to better focus on achieving a resolution.

6. Based on the foregoing, Defendants respectfully request the Court grant Defendants an extension of time until March 18, 2019, to respond to Plaintiff's Amended Petition

Respectfully submitted,
McCARTHY HOLTHUS, LLP

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Agreed:

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**ATTORNEY FOR PLAINTIFF
FREDDY G GONZALEZ**

CERTIFICATE OF SERVICE

I hereby certify that I submitted the foregoing to the clerk of the United States District Court, Southern District of Texas using the electronic case filing system of the Court, and that I served all counsel of record listed below in accordance with Federal Rule of Civil Procedure 5(b)(2) on January 29 2019.

via CM/ECF File

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**ATTORNEY FOR PLAINTIFF
FREDDY G GONZALEZ**

/s/ Brandon Hakari
Brandon Hakari

CERTIFICATE OF CONFERRAL

I hereby certify that on January 29th 2019, I conferred with Plaintiff's counsel regarding this Motion, and he agreed to the Motion as indicated by his signature.

/s/ Brandon Hakari
Brandon Hakari